

## **REMARKS**

Claims 5-10 have been objected to under 37 CFR 1.75(c) because a multiple dependent claim cannot depend from another multiple dependent claim. Claims 5-10 have been amended to avoid this problem.

Claims 1-4 have been rejected under 35 USC 112, second paragraph, for the reasons noted in the Office Action.

Claim 1 has amended in order to overcome the indefiniteness rejection: “the relevance of a document” has been replaced by “a relevance of a document”; “on the basis of” has been replaced by “based upon”; “being an estimation related to” has been replaced with “by estimating the presence of” (support for this replacement is found on page 7, line 36 to page 8 line 5). The definition of a “semantic neighborhood” has been added in claim 1. That definition has been found on page 1, lines 11-13 of the specification.

Claim 2 is amended in order to overcome the indefiniteness rejection: “the presence” has been replaced by “a presence”.

Claim 3 is amended in order to overcome the indefiniteness rejection: the definition of a “semantic cloud” has been added. That definition appears on page 3, lines 30-32 of the specification.

Claims 1-4 have been rejected under 35 USC 101 because the claimed invention is considered non-statutory.

Claim 1 has been amended in order to highlight the practical application of the method. That application consists in marking a document with a result of the calculation of the ambiguity function (see page 8, lines 26-31) such that a user is informed whether

the document is or is not of interest (see page 2, lines 20-25). Thus, the claimed method is not just a mathematical calculation, but has the practical application to better alert a user about the relevance of a document relative to a concept.

Claims 1-4 have been rejected under 35 USC 102 as being anticipated by Chaudhuri (U.S. 7,252,648).

The subject matter of claim 1 is intended to alert a user that a concept has or has not different meanings in a document. The claimed method teaches calculating a function, called ambiguity function, by estimating the presence of different meanings of the concept in the document, and marking the document considered to be relevant with a result of the calculation of the ambiguity function.

The method of Chaudhuri does not include the step of marking the document with the result of the calculation of the ambiguity function to alert a user that a concept has or has not different meanings in a document.

Chaudhuri discloses a method of estimating a relevance of a document (e.g. a file. disclosing a house (example 1) or a car (examples 2.3, 4) with respect to a query (e.g. a price for a house or a car}, that method comprises calculating a relevance function of the query with respect to said document based upon a known predetermined set of queries in a knowledge base that are related to that query by different semantic links, said set of queries being called a semantic neighborhood of the query. For instance, the query can be a price and the semantic neighborhood contains prices that are close to said price (see col. 7, lines 32-35).

However, Chaudhuri only discloses methods for ranking objects, such as houses or cars. It does not disclose the calculation of a function by estimating the presence of

different meanings of a same concept in the document. Thus, Chaudhuri does not teach calculating an ambiguity function, as defined in claim 1.

Chaudhuri does not disclose an ambiguity function because of the following reasons:

1. In Chaudhuri, queries are not concepts as defined in claim 1. Indeed, queries are prices, colors, models... (see for instance col. 11, lines 58-59). These queries cannot have different meanings. For instance, time meaning of a price is that price and can't be another meaning.

2. Since queries cannot have different meanings, it is not meaningful to calculate an ambiguity function in Chaudhuri. Indeed, an ambiguity function is intended to estimate the presence of different meanings of a concept in a document.

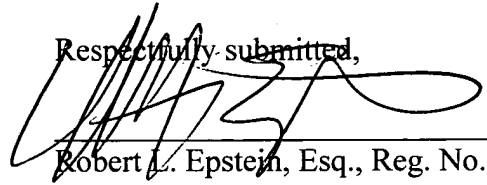
3. Chaudhuri does not disclose a function intended to estimate the presence of different meanings of a concept in a document.

In particular, the similarity function of col. 8, lines 30-35, that the examiner considers as an ambiguity function, is intended to compare the similarities between two sets of queries ("t" and "Q"). Thus, this similarity function does not allow to estimate the presence of different meanings of a concept in a document at all.

Moreover, Chaudhuri does not disclose marking a document considered to be relevant with a result of the calculation of the ambiguity function.

Accordingly, Chaudhuri does not disclose all features of claim 1. Thus, claims 1-4 cannot be anticipated by Chaudhuri.

Respectfully submitted,



Robert L. Epstein, Esq., Reg. No. 26451  
EPSTEIN DRANGEL  
BAZERMANN & JAMES, LLP  
Attorneys for Applicant  
60 East 42<sup>nd</sup> Street, Suite 820  
New York, New York 10165  
Tel. No.: (212) 292-5390  
Fax. No.: (212) 292-5391

Z:\France Telecom\2085-104US\PTO Papers\Amend 1.doc